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- Investigated the closure of Cardell, and filed the first action against it on September 16, 2013 on behalf of Fernando Rangel, a former employee.
- Worked cooperatively with counsel that filed another related case against Cardell, and collectively filed an amended complaint on behalf of three plaintiffs on October 28, 2013.
- Conducted factual and legal research related to adding H.I.G. Capital and related entities as defendants. This included speaking with (and obtaining signed statements from) several former Cardell employees, and conducting legal research regarding the single employer theory under the WARN Act.
- Researched, drafted and filed a memorandum in opposition to H.I.G.'s motion to dismiss the first amended complaint, which was subsequently denied by the Court without prejudice on January 17, 2014.
- Exchanged initial disclosures with the H.I.G. Defendants, and served them with interrogatories and document requests. Reviewed and analyzed their responses.
- Filed a motion for class certification with respect to the H.I.G. Defendants, which was granted by the Court on January 22, 2014.

- Drafted proposed notice to the class of the Court's certification order, and caused it to be sent out after it was approved by the Court on February 6, 2014.
- Served subpoenas on third parties Wells Fargo (one of Cardell's secured creditors), and CoAdvantage f/k/a Odyssey One Source, Inc. (Cardell's payroll processor). Worked with a computer forensic consultant regarding the Cardell servers in Wells Fargo's possession.
- Prepared for and participated in an all-day mediation session with JAMS' mediator David Geronemus on June 25, 2014, which ultimately resulted in a settlement in principle to resolve this case.
- Continued negotiations with counsel for the H.I.G. Defendants after the mediation, and worked with them on drafting the settlement agreement and related documents.
- Retained a notice and tax accounting firm – the Heffler Claims Group – to take primary responsibility for providing settlement class notification, issuing a press release, distributing the appropriate tax forms, and administering the settlement.
- Over the course of the case, spoke with numerous putative class members regarding the status of the lawsuit and the settlement.
- Retained a Spanish speaking attorney to draft Spanish versions of the settlement notice, and to speak with class members who preferred to speak with someone in Spanish.

3. The schedule attached as Exhibit A, and incorporated herein, is a detailed summary of the amount of time spent by my firm's partners, attorneys and professional support staff who were involved in this litigation. The lodestar calculation is based on my firm's current billing rates. Exhibit A was prepared from contemporaneous time records regularly prepared and maintained by my firm. The hourly rates for my firm's partners, attorneys and professional support staff included in Exhibit A are the usual and customary hourly rates charged for their services in similar complex class actions.

4. The total number of hours expended on this litigation by my firm from inception to October 31, 2014 is 934.50 hours. The total lodestar for my firm is \$445,380.00.¹ I anticipate that my firm will incur additional time and expenditures after this date which are not accounted for herein. All of my firm's work on this time has been performed on a contingency fee basis.

5. My firm's lodestar is based on the firm's current billing rates, which do not include charges for expense items. Expense items are billed separately and are not duplicated in my firm's lodestar.

6. My firm expended a total of \$40,042.35 in unreimbursed expenses necessary in connection with the prosecution of this litigation. These expenses are described in Exhibit B, which is attached hereto and incorporated herein.

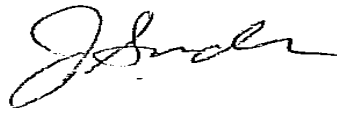
7. The expenses my firm incurred in litigating this action are reflected in the books and records of my firm. These books and records are prepared from

¹ Detailed hourly time records are available to the Court upon request.

expense vouchers, receipts, check records and other source materials and accurately reflect the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 10th day of November, 2014, at Haverford, Pennsylvania.

A handwritten signature in black ink, appearing to read "J. Sauder", is positioned above a horizontal line.

Joseph G. Sauder

EXHIBIT A

CARDELL CABINETRY, LLC

Time Report and Lodestar Summary

Firm Name: Chimicles & Tikellis LLP

Inception to October 31, 2014

Professional (Status)*		Current Rate	Hours	Lodestar
Chimicles, Nicholas E.	(P)	\$950.00	1.50	\$1,425.00
Sauder, Joseph G.	(P)	\$700.00	217.00	\$151,900.00
Schelkopf, Matthew D.	(P)	\$600.00	33.25	\$19,950.00
Mathews, Timothy N.	(P)	\$600.00	0.25	\$150.00
Johns, Benjamin F.	(P)	\$500.00	426.00	\$213,000.00
Kenney, Joseph B.	(A)	\$300.00	34.25	\$10,275.00
Mastraghin, Corneliu	(PL)	\$250.00	3.50	\$875.00
Royer, Jesse	(PL)	\$150.00	29.00	\$4,350.00
Cain, Shelby R.	(PL)	\$175.00	76.25	\$13,343.75
Ward, Donna M.	(LA)	\$250.00	20.50	\$5,125.00
Goldson, Jacqueline R.	(LA)	\$220.00	9.00	\$1,980.00
Kane, Erica E.	(LC)	\$225.00	7.00	\$1,575.00
Cali, Matthew R.	(FLC)	\$275.00	14.25	\$3,918.75
Krebs, Konrad R.	(FLC)	\$150.00	23.25	\$3,487.50
Ngo, Phuong	(FLA)	\$60.00	8.00	\$480.00
Jauregui, Tannia A.	(IC)	\$430.00	31.50	\$13,545.00
TOTALS:			934.50	\$445,380.00

*Professional (Status): (P) = Partner, (A) = Associate, (PL) = Paralegal, (LA) = Legal Assistant, (LC) = Law Clerk, (IC) Independent Contractor, (FLC) = Former Law Clerk, (FLA) = Former Legal Assistant

EXHIBIT B

CARDELL CABINETRY, LLC
FIRM NAME: CHIMICLES & TIKELLIS LLP
EXPENSE REPORT
REPORTING PERIOD: INCEPTION TO OCTOBER 31, 2014

EXPENSE CATEGORY	UNREIMBURSED EXPENSES
Filing Fees	\$75.00
Express Mail	\$411.91
Photocopy - Firm	\$850.25
Postage	\$901.99
Travel, Food, Lodging	\$1,196.92
Miscellaneous Client Expense	\$1,295.06
Computer Research	\$2,747.45
Professional Services/Fees	\$5,249.01
Estimated Claims Administration Expense	\$27,314.76
TOTALS	\$40,042.35